

14 September 1999

Regional Administrator U.S. Environmental Protection Agency, Region IX Pesticides and Toxic Substances Branch (A-4-4) 75 Hawthorne Street San Francisco, CA 94105

To Whom It May Concern:

It has been brought to the attention of Safety-Kleen (Los Angeles), Inc. that a discrepancy occurred with Safety-Kleen's receipt on 08/03/98 of one drum of PCB-contaminated debris from Lockheed Martin Skunkworks. Specifically, there was greater than a 10% difference between the (estimated) manifested weight of this drum and the actual weight, determined later. Please be advised that this discrepancy resulted from an inaccurate weight estimate, and not from any release of container contents. However, due to the delayed resolution of this matter, this letter is being submitted to U.S. EPA pursuant to 40 CFR 761.210(b).

The drum at issue was originally transported on 07/28/98 using California Manifest #96885410, which estimated the container weight at 136 kilograms. Upon receipt at Safety-Kleen (Los Angeles), Inc. on 08/03/98, a scale determined the actual container weight to be 96 kilograms, but there is no indication that a weight discrepancy was noted or resolved at that time. Recently, however, the weight discrepancy was discovered and resolved verbally with the generator by concluding that 136 kilograms was a high weight estimate.

From the time of its original transport from the generator's site, the drum was managed without incident, and was remanifested for disposal in Grassy Mountain, Utah using California Manifest #96644287. The container was transported from Safety-Kleen (Los Angeles), Inc. on 08/22/98, arrived in Grassy Mountain without incident on 08/25/98, and was disposed on 08/28/98.

With this letter, please find copies attached of both manifests, as well as the Certificate of Disposal for this container. If there are questions regarding this submittal, please feel free to contact me at (323) 277-2528.

Sincerely

John Gilkay

Environmental Compliance Manager

attachments

cc: Vince McKay, Lockheed Martin Skunkworks, Palmdale, CA

File, Safety-Kleen, Los Angeles, CA

Craig Lackey, Corporate Counsel, Safety-Kleen, Columbia, SC

DO NOT WRITE BELOW THIS LINE.

20. Facility Owner or Operator Certification of receipt of hazordous materials covered by this manifest except as noted in Item 19

Printed/Typed Name

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## See Instructions on back of page 6.

Department of Taxic Substances Cantrol
Sacramento, California

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E CENTER 1-800-424-8802: WITHIN CRIPORNIA, CALL 1-800-852-7550

EMERGENCY OR SPILL, CALL THE NATIONAL RESP.

CASE OF

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## CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc. Grassy Mountain Pacility 3 mi. East, 7 mi. North of Exit 41\* Clive UT EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to SAFETY-KI.EEN (LOS ANGELES)-230 to confirm that load # 1998004537

LIME	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DIS	SPOSAL CEL	L DISPOSED
1/A	G897-0172	012525 PCB CONTAMINATED DEBRIS	99.80	DRUM	CB	/c22 /2	08/28/98

shipped on manifest number CAD050806850-98499 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulant statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cent. # 003727

Safety-Kleen (Lone and Grassy Mountain), Inc., Grassy Mountain Facility EPA ID# UTD991301748

Gary Mossor, General Manager